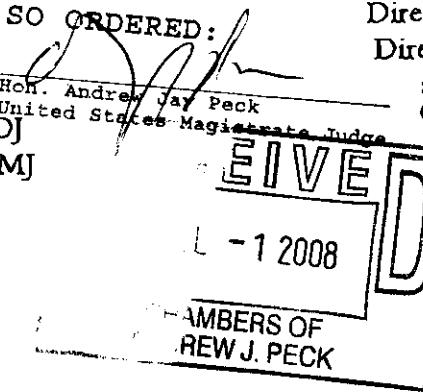


# MEMO ENDORSED

1. Every brief by UFT says and is planned but not to be short as possible set (1) coordinate with **STROOCK** Edward S. G. Stroock & Sons  
2. JEP never has planned or written and briefs to not be for a short defendant. I believe order by order completely until we open a "lame" §636(c) court for plaintiffs unless to draw. See you all are doable to **Andrew J. Peck** & **Victor Marrero** July 1, 2008

**VIA FACSIMILE**  
Alan M. Klinger  
Direct Dial 212-806-5818  
Direct Fax 212-806-7818  
aklinger@stroock.com

Honorable Victor Marrero, USDJ  
Honorable Andrew J. Peck, USMJ  
United States District Court  
Southern District of New York  
United States Court House  
500 Pearl Street  
New York, N.Y. 10007



Re: Teachers4Action et al. v. Bloomberg et al.;  
08 Civ. 548 (VM)(AJP)

USDC SDNY  
DOCUMENT  
ELECTRONICALLY FILED  
DOC#  
DATE FILED: 7/2/08

Honorable Judges:

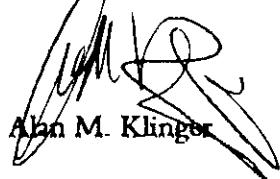
As the Court is aware, we represent Defendants Randi Weingarten, President of the United Federation of Teachers ("UFT"), the UFT and Betsy Combier (collectively, the "UFT Defendants") in the above-captioned matter. We write to request an extension of the page limitation set forth in Your Honors' individual practice rules.

On June 2, 2008, the UFT Defendants were served with Plaintiffs' sixty-three page Second Amended Complaint ("Second Complaint"), alleging twelve causes of action and annexing five exhibits. Pursuant to the schedule set forth by Magistrate Judge Peck in his June 11, 2008 Order, we intend to file a motion to dismiss the complaint in its entirety as to the UFT Defendants on July 7, 2008.

To meaningfully address the legal sufficiency of all the claims alleged in the voluminous Second Complaint, more than 25 pages is necessary. Therefore, we respectfully request that the page limitation be enlarged to 50 pages.

Honorable Victor Marrero, USDJ  
Honorable Andrew J. Peck, USMJ  
July 1, 2008  
Page 2

Respectfully,

A handwritten signature in black ink, appearing to read "Ann M. Klinger".

cc: Charles G. Moerdler, Esq.  
Edward D. Fagan, Esq.  
Blanche Greenfield, Esq.

**FAX TRANSMITTAL SHEET**

**ANDREW J. PECK  
UNITED STATES MAGISTRATE JUDGE  
UNITED STATES DISTRICT COURT**

Southern District of New York  
United States Courthouse  
500 Pearl Street, Room 1370  
New York, N.Y. 10007-1312

Fax No.: (212) 805-7933  
Telephone No.: (212) 805-0036

Dated: July 2, 2008

Total Number of Pages: 3

TO	FAX NUMBER
Edward D. Fagan, Esq.	646-304-6446 or 646-417-5558
Blanche Greenfield, Esq.	212-788-8877
Charles G. Moerdler, Esq.	212-806-2647
Dina Kolker, Esq.	212-806-2606
Alan M. Klinger, Esq.	212-806-7818

**TRANSCRIPTION:****MEMO ENDORSED 7/2/08**

1. **Oversize brief up to 50 pages will be permitted but (a) make it as short as possible and (b) coordinate with the Dep't of Education's motion if possible.**
2. **Judge Marrero has informed me that he will be referring the motion to me for a Report and Recommendation. I previously asked the parties whether they wished to agree on a "limited" § 636(c) consent for just the motions to dismiss. Since you all were unable to coordinate a joint response, each party is to separately inform the Court of their position by 7/7/08.**

**Copy to: Judge Victor Marrero**